## CALIFORNIA COASTAL COMMISSION

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November 16, 2004

Dr. David Kay Southern California Edison Company P.O. Box 800 Rosemead, CA 91770

Re: Compliance with Condition B of the SONGS Permit No. 6-81-330-A: SCE's 2003 Annual Marine Environmental Analysis Report

## Dear David:

On October 12, 2000, the California Coastal Commission concurred with the Executive Director's determination regarding the fish behavioral barriers required by Condition B of the coastal development permit for the San Onofre Nuclear Generating Station Units 2 and 3 (No. 6-81-330-A). (See staff report entitled Executive Director's Determination that Fish Behavioral Barriers Tested at SONGS are Ineffective, dated September 22, 2000.) As part of that permit compliance action, the Executive Director specified continuing monitoring requirements, which included submission of a written report of the Fish Chase procedure used at the plant.

As required, on July 31, 2004, SCE submitted the 2003 Annual Marine Environmental Analysis Report for the San Onofre Nuclear Generating Station. Chapter 4 of the report contains an assessment of in-plant fish, which includes data and analysis of the Fish Chase procedure.

The results of Chapter 4 indicate that the operation of the Fish Chase procedure during 2003 was consistent with the requirements enumerated in the Executive Director's determination. Specifically we note the following:

- (1) The impingement for the year was about 21,923 kg, which was 6,050 kg more than in 2002 but still less than the long-term average of about 22,064.
- (2) The Fish Chase procedure resulted in 2,386 kg of fish returned live to the ocean, a decrease of 2,715 kg from 2002.
- (3) For the year 2003 the Fish Chase effectiveness relative to impingement was 11%, which meets the 10% target value.
- (4) There was a clear discussion concerning methods, results and interpretation of results. A series of unusual events occurred in 2003 (e.g., Sea Lion rescues and returns of Giant Sea bass to the ocean). All resulted in a favorable outcome.

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We appreciate your continuing cooperation with the Commission staff in addressing the behavioral barriers permit condition.

Sincerely,

Susan M. Hansch

Chief Deputy Director

cc: H. W. Newton

K. T. Herbinson

Samir Tanious